

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:) Chapter 11
)
IYS Ventures, LLC,) Case No. 23-06782
)
) Hon. David D. Cleary

NOTICE OF MOTION

TO: Attached Service List

PLEASE TAKE NOTICE THAT on June 21, 2023, at 10:00 a.m., I shall appear before the Honorable Judge David D. Cleary, or any other judge sitting in his stead, either in Courtroom 644, 219 South Dearborn Street, Chicago, Illinois, or electronically as described below and request a hearing on the Debtor's Application to Employ Attorneys, a copy of which is attached hereto and thereby served upon you.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government (audio only).

To appear by Zoom using the internet, use this link: <http://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is Meeting ID: 161 122 6457 and the password is Cleary644. The meeting ID and password can also be found on the judge's page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, these motions will be called on the presentment date. If no Notice of Objection is timely filed, the Court may grant the motions in advance without a hearing.

CERTIFICATE OF SERVICE

I, the undersigned, an attorney, hereby state that pursuant to Section II, B, 4 of the Administrative Procedures for the Case Management/Electronic Case Filing System, I caused a copy of the foregoing NOTICE OF MOTION and MOTION to be served on all persons set forth on the attached Service List identified as Registrants through the Court's Electronic Notice for Registrants and, as to all other persons on the attached Service List by mailing a copy of same in an envelope properly addressed and with postage fully prepaid and by depositing same in the U.S. Mail, Chicago, Illinois, on the 7th day of June 2023.

/s/ Gregory K. Stern
Gregory K. Stern

Gregory K. Stern (Atty. ID #6183380)
Dennis E. Quaid (Atty. ID #02267012)
Monica C. O'Brien (Atty. ID #6216626)
Rachel S. Sandler (Atty. ID #6310248)
53 West Jackson Boulevard, Suite 1442
Chicago, Illinois 60604
(312) 427-1558

SERVICE LIST

Registrants Served Through The Court's Electronic Notice For Registrants

Patrick Layng, United States Trustee
219 South Dearborn Street, Suite 873
Chicago, Illinois 60604

William J. Serritella
Yeoeun C. Yoon
111 East Wacker Drive, #2600
Chicago, Illinois 60601

Daniel Scheeringa
4711 Golf Road, #200
Skokie, Illinois 60076

Parties Served Via United States Mail

IYS Ventures, LLC
15416 South 70th Court
Orland Park, Illinois 60462

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APPLICATION TO EMPLOY ATTORNEYS

NOW COMES IYS Ventures, LLC, Debtor and Debtor in Possession, by and through its attorneys, Gregory K. Stern, Dennis E. Quaid, Monica C. O'Brien and Rachel S. Sandler, and in support of its Application to Employ Attorneys, states as follows:

1. On May 23, 2023, the Debtor filed a Voluntary Petition for relief under Chapter 11 of the United States Bankruptcy Code.
2. This Court has jurisdiction pursuant to 28 U.S.C. § 1334; and this matter constitutes a core proceeding under 28 U.S.C. § 157(b)(2)(A).
3. The Debtor, as Debtor In Possession, has continued in possession of its property, pursuant to §§ 1107 and 1108.
4. The Debtor owns and operates gas stations located in Illinois, Minnesota, Michigan, Indiana, Wisconsin, and Louisiana.
5. The Debtor desires to employ Gregory K. Stern, Monica C. O'Brien, Dennis E. Quaid and Rachel S. Sandler (the "Attorneys"), who are duly admitted to practice law before this Court.
6. Your Applicant has agreed to the employment of the Attorneys in the case and the Attorneys received payment of \$25,000.00 from Areej Samara, the wife of Muwafak Rizek, the managing member of the Debtor, prior to filing. The agreement provides that the Attorneys shall be compensated for services rendered in accordance with their hourly rates as in effect from time to time, with all compensation and reimbursement of costs and expenses being subject to further approval of this Court.

At present, the Attorneys' hourly rates are as follows: \$650.00 for Gregory K. Stern, \$550.00 for Dennis E. Quaid and Monica C. O'Brien, and \$400.00 for Rachel S. Sandler.

7. Your Applicant has selected Gregory K. Stern, Dennis E. Quaid, Monica C. O'Brien and Rachel S. Sandler for the reason that they have experience in matters of this nature and are well qualified to represent the Debtor as Debtor in Possession in this case.

8. The professional services to be rendered by Gregory K. Stern, Monica C. O'Brien, Dennis E. Quaid and Rachel S. Sandler include but are not limited to:

- (a) Reviewing assets, liabilities, loan documentation, account statements, executory contracts and other relevant documentation;
- (b) Preparation of list of creditors, list of twenty largest unsecured creditors, schedules and statement of financial affairs;
- (c) Giving your Applicant legal advice with respect to its powers and duties as Debtor in Possession in the operation and management of his financial affairs;
- (d) Assisting your Applicant in the preparation of schedules, statement of affairs and other necessary documents;
- (e) Preparation of applications to employ attorneys, accountants or other professional persons, motions for turnover, motion for use of cash collateral, motions for use, sale or lease of property, motion to assume or reject executory contracts, plan, applications, motions, complaints, answers, orders, reports, objections to claims, legal documents and any other necessary pleading in furtherance of reorganizational goals;
- (f) Negotiating with creditors and other parties in interest, attending court hearings, meetings of creditors and meetings with other parties in interest;
- (g) Reviewing proofs of claim and solicitation of creditors' acceptances of plan; and,
- (h) Performing all other legal services for the Debtor, as Debtor in Possession, which may be necessary or in furtherance of his reorganizational goals.

9. To the best of your Applicant's knowledge Gregory K. Stern, Monica C. O'Brien, Dennis E. Quaid and Rachel S. Sandler have no relationship or connections with the Debtor, its creditors, or any other party in interest herein, their respective attorneys and accountants, the United States Trustee or any other person employed in the office of the United States Trustee.

10. Gregory K. Stern, Monica C. O'Brien, Dennis E. Quaid and Rachel S. Sandler represent no interests adverse to the Debtor, as Debtor in Possession, or to the estate in the matters upon which they are to be engaged for Debtor, as Debtor in Possession, and their employment will be in the best interest of the estate. The Affidavits of Gregory K. Stern, Monica C. O'Brien, Dennis E. Quaid and Rachel S. Sandler attesting to the foregoing are attached hereto and are made a part hereof.

WHEREFORE, the Debtor, IYS Ventures, LLC, prays for an order, pursuant to 11 U.S.C. §327(a) i) authorizing the employment of the Attorneys as attorneys for the Debtor as Debtor in Possession under the terms and conditions set forth herein, effective May 23, 2023, and ii) for such other further relief as this Court deems just.

By: /s/ Gregory K. Stern
Gregory K. Stern, Attorney

Gregory K. Stern (Atty. ID #6183380)
Dennis E. Quaid (Atty. ID #02267012)
Monica C. O'Brien (Atty. ID #6216626)
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